

Appln. No. 10/649,052  
Amendment dated Sep. 6, 2005  
Reply to Office Action of May 4, 2005  
Docket No. BOC9-2003-0017 (386)

### **REMARKS/ARGUMENTS**

These remarks are made in response to the Office Action of May 4, 2005 (Office Action). This response is filed after the 3-month shortened statutory period, and as such, a retroactive extension of time is hereby requested. The Examiner is authorized to charge the appropriate extension fee to Deposit Account 50-0951.

In paragraphs 2-3 of the Office Action, the Examiner has rejected claims 1-9 under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 5,915,001 to Uppaluru (hereinafter "Uppaluru").

Independent Claims 1, 5, and 6 have been amended so as to further clarify certain features of Applicants' invention. As discussed herein, the amendments are fully supported in the Specification, and no new matter has been introduced by the amendments.

#### **I. Applicants' Invention**

It may be helpful to reiterate certain aspects of Applicants' invention before addressing the cited reference. One aspect of the invention is the aggregation of multiple, different interactive voice response (IVR) services under a centralized system. More particularly, the invention provides a master IVR service through which a caller can access several different IVR systems. Using the master IVR service, the caller can, for example, register with the master IVR service and provide access information for one or more IVR systems. After registering with the master IVR service, the caller need only recall the access number and logon information for the master IVR service. Once the caller is logged on to the master IVR service, the caller can access any other IVR systems which the caller has registered with the master IVR service. That is, the master IVR

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service can log the caller into other IVR systems, forward caller queries to the IVR systems, and retrieve information from the IVR systems to relay back to the caller.

One embodiment of the invention is a method of aggregating IVR services from one or more interactive voice response systems. The method can include, for at least one caller, storing service information for one or more services within a master IVR system. (See, e.g., Specification, p. 5, lines 10-29.) A specific individual service can be accessed through a corresponding one of the IVR systems. The method further can include receiving a call from the caller and receiving an input from the caller over the call. The input can identify one or more services and corresponding interactive voice response systems. Accordingly, the IVR system corresponding to the identified service can be accessed on behalf of the caller through the master IVR system. (Specification, p. 5, line 30 – p. 6, line 10.) Information from the IVR system corresponding to the identified service can be retrieved and provided to the caller through the master IVR system. (Specification, p. 6, lines 6-10.)

In yet another embodiment, the service information can include login information for each of the services. In that case, the accessing step can include logging on to one or more of the IVR systems. The service information further can specify instructions for navigating an interactive voice response menu hierarchy for one or more of the services. Also, the caller input can specify a caller query for information to be retrieved from one or more of the services. Accordingly, the accessing step can include submitting the caller query to one or more of the services.

## **II. The Claims Define Over The Cited Reference**

As noted above, Claims 1-9 were deemed by the Examiner to be anticipated by Uppaluru. Uppaluru is directed to a system and method intended to extend conventional

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Internet and Web-based technologies so as to allow a user to access and navigate among voice-based documents. (Col. 4, lines 38-51; Abstract) Uppaluru utilizes information that is formatted according to known MIME and HTML standards but that is further customized to include "extensions" for voice information access and navigation. (Col. 7, line 5 – Col. 9, line 2; Abstract) The voice documents in Uppaluru are linked to form a "voice web" using HTML hyper-links that are accessible to subscribers using voice commands, touch-tone inputs, and other selection means. (Col. 4, line 62 – Col. 5, line 2; Col. 5, line 57 – Col. 6, line 52; Abstract.) Applicants respectfully submit, however, that Uppaluru fails to expressly or inherently teach each feature of Applicants' invention.

Independent Claim 1, as amended, is directed to a method of aggregating interactive voice response services from a plurality of interactive voice response systems. Claims 5 and 6, as also amended, are similar in that the claims recite, respectively, a system and machine-readable instructions for aggregating interactive voice response services using a master interactive voice response system.

The method recited in amended independent Claim 1 includes storing service information for a plurality of services within the master interactive voice response system, wherein each service is accessible through a corresponding one of the plurality of interactive voice response systems. The master interactive voice response system provides an interface between the caller and the services by performing at least one of storing caller-specific information, accessing at least one of the plurality of interactive voice response systems on behalf of a caller, forwarding a query from the caller to at least one of the plurality of interactive voice response systems, and providing a query response from at least one of the plurality of interactive voice response systems to the caller. (See, e.g., Specification, p. 5, line 19 – p. 6, line 10.)

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The method further includes receiving a call from the caller to the master interactive voice response system, and receiving an input from the caller to the master interactive voice response system. The input identifies at least one of the plurality of services and corresponding interactive voice response systems. Additionally, the method includes accessing the interactive voice response system corresponding to the identified service through the master interactive voice response system on behalf of the caller, and retrieving information from the interactive voice response system with the master interactive voice response system. The method also includes providing the retrieved information to the caller from the master interactive voice response system.

Uppaluru, for example, does not disclose, either expressly or inherently, storing service information for each of a plurality of services within a master interactive voice response system, as recited in amended independent Claims 1, 5, and 6. No service information relating to any of the individual commerce service pages 315-321, noted at page 2 of the Office Action, is stored in a separate interactive voice system by Uppaluru, let alone a master interactive voice system for performing even one of the functions recited in the claims, as amended.

Instead, Uppaluru's service pages, jointly designated in FIG. 3 as element 332, are merely "linked" individually to a personal helpdesk page 304, which in turn, is linked to a personal home page 301. (Col. 11, lines 25-29; Col. 12, lines 30-47.) These links merely provide a mechanism for accessing the individual pages in the "standard way." (Col. 11, lines 19-24.) Thus, the commerce service pages do not themselves, individually or in the aggregate, constitute a separate interactive voice system. Not one of the service pages stores any information except that needed for the service page to perform its own individual processing functions.

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More fundamentally, even though the personal home page 301 of Uppaluru links, ultimately, to the individual commerce service pages 315-321, the personal home page likewise does not constitute a master interactive voice response system. The personal home page 301 of Uppaluru comprises personalized, user-specific information. It does not, however, store service information for even one the plurality of commerce service pages. Uppaluru makes explicit the fact that the linking of the personal home page 301 to the individual commerce service pages 315-321 does not constitute a master interactive voice response system for performing any of the functions recited in the claims: the "linked page structure" is intended to permit a user to navigate within a voice web and to access information in the "standardized way" used by web applications generally. (Col. 11, lines 19-24.)

These fundamental differences between Uppaluru and Applicants' invention are not surprising given that each is directed to entirely distinct objectives. Whereas Applicants method and system are directed to aggregating interactive voice response services, Uppaluru is explicitly directed to extending conventional Internet and Web-based technology to voice-based technology by providing voice-based documents whose MIME and HTML standard formats are customized with "extensions for voice information access and navigation." (Abstract; See also Col. 1, line 66 – Col. 2, line 19, and Col. 4, lines 38-51.) Uppaluru's standardized linking, though extending conventional web-based technology to voice-based technology, does not provide a mechanism for aggregating interactive voice response services, generally, and does not expressly or inherently teach a master interactive voice response system for storing service information for each of a plurality of services or performing even one of the functions specifically recited in amended independent Claims 1, 5, and 6.

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Applicants respectfully submit that Uppaluru thus fails to teach or suggest each of the features of independent Claims 1, 5, and 6, as amended, and that the claims therefore define over the prior art. Applicants further respectfully submit that whereas the remaining claims each depends from one of the amended independent claims while reciting additional features, the dependent claims therefore also define over the prior art.

### CONCLUSION

Applicants believe that this application is now in full condition for allowance, which action is respectfully requested. Applicants request that the Examiner call the undersigned if clarification is needed on any matter within this Amendment, or if the Examiner believes a telephone interview would expedite the prosecution of the subject application to completion.

Respectfully submitted,

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